

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

TEODORO COTERA,)
Plaintiff,)
v.) CIVIL A. NO. 05 10831 PBS
CLEANCO MAINTENANCE CORP.,)
J.L.D CLEANING SERVICES, INC.)
ROBERT LEONE, and DEBORAH J.)
LEONE,)
Defendants.)

**DEFENDANTS' ANSWER TO PLAINTIFF'S COMPLAINT AND JURY
DEMAND**

NOW COME the herein-names Defendants, Cleanco Maintenance Corp., J.L.D. Cleaning Services, Inc., Robert Leone, and Deborah Leone, through their legal counsel, LeClair & LeClair, P.C., and hereby ANSWER Plaintiff's Complaint as follows:

1. Denied.
2. Denied.
3. Denied.
4. Denied.
5. Paragraph 5 states the intention of the Plaintiff, which can neither be admitted nor denied by the Defendants, and therefore does not warrant a response.
6. Denied.
7. Denied.
8. Denied.

9. Denied.

10. The Defendants have insufficient information to either admit or deny the allegations of paragraph 10.

11. Admitted.

12. Admitted.

13. Admitted.

14. Admitted.

15. Denied.

16. Admitted.

17. Denied.

18. Denied.

19. Admitted.

20. The Defendants lack sufficient information to either admit or deny the allegations of Paragraph 20, and call upon the Plaintiff to prove the same at the time of trial.

21. The Defendants lack sufficient information to either admit or deny the allegations of Paragraph 21, and call upon the Plaintiff to prove the same at the time of trial.

22. The Defendants lack sufficient information to either admit or deny the allegations of Paragraph 22, and call upon the Plaintiff to prove the same at the time of trial.

23. The Defendants lack sufficient information to either admit or deny the allegations of Paragraph 23, and call upon the Plaintiff to prove the same at the time of trial.

24. The Defendants lack sufficient information to either admit or deny the allegations of Paragraph 24, and call upon the Plaintiff to prove the same at the time of trial.

25. The Defendants lack sufficient information to either admit or deny the allegations of Paragraph 25, and call upon the Plaintiff to prove the same at the time of trial.

26. Denied.

27. The Defendants lack sufficient information to either admit or deny the allegations of Paragraph 27, and call upon the Plaintiff to prove the same at the time of trial.

28. The Defendants lack sufficient information to either admit or deny the allegations of Paragraph 28, and call upon the Plaintiff to prove the same at the time of trial.

29. The Defendants lack sufficient information to either admit or deny the allegations of Paragraph 29, and call upon the Plaintiff to prove the same at the time of trial.

30. Denied.

31. Denied.

32. Denied.

33. Denied.

34. The Defendants lack sufficient information to either admit or deny the allegations of Paragraph 34, and call upon the Plaintiff to prove the same at the time of trial.

35. The Defendants lack sufficient information to either admit or deny the allegations of Paragraph 35, and call upon the Plaintiff to prove the same at the time of trial.

36. The Defendants lack sufficient information to either admit or deny the allegations of Paragraph 36, and call upon the Plaintiff to prove the same at the time of trial.

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115. The Defendants lack sufficient information to either admit or deny the allegations of Paragraph 115, and call upon the Plaintiff to prove the same at the time of trial.

116. The Defendants lack sufficient information to either admit or deny the allegations of Paragraph 116, and call upon the Plaintiff to prove the same at the time of trial.

117. The Defendants restate and incorporate by reference their prior answers to the paragraphs referred in these allegations.

118. Denied.

119. Denied.

120. Denied.

121. Denied.

122. The Defendants restate and incorporate by reference their prior answers to
the paragraphs referred in these allegations.

123. Denied.

124. Denied.

125. Denied.

126. Denied.

127. The Defendants restate and incorporate by reference their prior answers to
the paragraphs referred in these allegations.

128. Denied.

129. Denied.

130. Denied.

131. Denied.

132. Denied.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

By way of affirmative defense, the Defendants state that with respect to each and every Count of the Plaintiff's Complaint, the Plaintiff has failed to state a claim for which relief may be given.

SECOND AFFIRMATIVE DEFENSE

By way of affirmative defense, the Defendants state that the Plaintiff's claims are barred under the doctrine of unclean hands.

Cleaning Services, Inc., Robert Leone, and Deborah Leone, awarded legal fees costs of defense any other relief the Court deems just and reasonable.

JURY TRIAL DEMAND

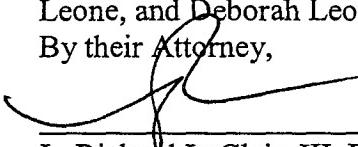
THE DEFENDANTS, CLEANCO MAINTENANCE CORP., J.L.D. CLEANING SERVICES, INC., ROBERT LEONE, AND DEBORAH LEONE, REQUEST A JURY TRIAL ON ALL COUNTS OF THE PLAINTIFF'S COMPLAINT.

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the within document was served upon the attorney of record for each party by mail/hand.

Dated: 6/11/05

Respectfully submitted,
Cleanco Maintenance Corp., J.L.D.
Cleaning Services, Inc., Robert
Leone, and Deborah Leone,
By their Attorney,


L. Richard LeClair, III, Esq.
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